

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ASHLEY VELA, on behalf of herself and a)	
class,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 21-cv-703
)	
ITX HEALTHCARE, LLC,)	
)	
Defendant.)	
)	

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant ITX Healthcare, LLC (“ITX”), by and through its counsel Gordon & Rees, LLP, hereby files its Notice of Removal of the action styled *Ashley Vela, on behalf of herself and a class, versus ITX Healthcare, LLC*, Case Number 2020-CH-7372, from the Circuit Court of Cook County, Illinois to the United States District Court for the Northern District of Illinois, Eastern Division. The grounds for removal are as follows:

BACKGROUND

1. On December 18, 2020, Plaintiff Ashley Vela (“Plaintiff” or “Vela”) filed the State Court Action. The State Court Action is a complaint for violation of the Federal Fair Debt Collections Practices Act, 15 U.S.C. § 1692, *et seq.* (“FDCPA”). ITX disputes the allegations.

2. ITX first received notice of this lawsuit on January 8, 2021, when it was served with a copy of Plaintiff’s Complaint upon its registered agent for service of process in Illinois. Pursuant to 28 U.S.C. § 1446(a), true and accurate copies of all summons, process, pleadings, motions, and orders filed in the State Court Action are attached hereto as **Exhibit A**.

PROCEDURAL REQUIREMENTS

3. This Notice of Removal is timely filed within thirty days of service on ITX's registered agent for service of process. See 28 U.S.C. § 1446(b).

4. As noted above, Plaintiff purports to set forth a cause of action for a claimed violation of the FDCPA, 15 U.S.C. § 1692 *et seq.* Therefore, federal question jurisdiction exists over Plaintiff's claim under 28 U.S.C. § 1331, because the resolution of Plaintiff's claim will require the adjudication of a disputed question of federal law.

5. Because Plaintiff's claim arises under the laws of the United States, removal of this cause of action is appropriate under 28 U.S.C. §§ 1441(a) – (c).

6. This Court embraces the locality in which the State Court Action is now pending, making this Court a proper forum pursuant to 28 U.S.C. § 1441(a).

7. No previous application has been made for the relief requested herein.

8. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being served upon Plaintiff, and a copy is being filed with the Circuit Court of Cook County, Illinois.

9. Pursuant to Federal Rule of Civil Procedure 7.1, a copy of the Corporate Disclosure Statement of ITX is attached hereto as **Exhibit B**.

10. A completed Civil Cover Sheet is attached as **Exhibit C**.

11. By filing this Notice of Removal, ITX does not waive any jurisdictional objection or other defense that is or may be available to it.

WHEREFORE, Defendant ITX Healthcare, LLC, hereby removes the action now pending in the Circuit Court of Cook County, Illinois, and requests that this Court assume and retain full jurisdiction over this action for all further proceedings.

Dated: February 8, 2021

Respectfully submitted,

**GORDON REES SCULLY
MANSUKHANI, LLP**

By: /s/ Thomas G. Cronin
One of the Attorneys for Defendants

Thomas G. Cronin, #6282701
Bryan G. Lesser #6330021
**GORDON REES SCULLY
MANSUKHANI, LLP**
One North Franklin St., Suite 800
Chicago, IL 60606
Ph. (312) 619-4918
Fax. (312) 565-6511
tcronin@grsm.com
Blessner@grsm.com